

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN	*	CIVIL NO.: 24CV01136
	*	
Plaintiff	*	
	*	
V	*	
	*	
McCONNELL VALDES, LLC;	*	
ANTONIO A. ARIAS-LARCADA, ET AL	*	
	*	
Defendants	*	
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PLAINTIFF'S MOTION FOR LEAVE TO FILE  
VERIFIED THIRD AMENDED COMPLAINT

TO THE HONORABLE COURT:

COMES NOW Plaintiff, Alan B. Goldman, by and through his undersigned counsel, and respectfully States and Prays as follows:

1. On March 25<sup>th</sup>, 2024, Plaintiff Goldman filed his amended complaint.  
[Docket Entry 4]
2. On June 13<sup>th</sup>, 2024, Defendants filed their Answer to Verified Amended Complaint and Counterclaim. [Docket Entry 14]
3. That there were new causes of action due to the filing of the counterclaim. These new allegations could not have been made before.
4. On February 27, 2025, the Settlement/Scheduling conference before Honorable Marshall D. Morgan, United States Magistrate Judge was held and the new date for filing an amended complaint is March 21, 2025.

5. In view of the foregoing, Plaintiff Alan Golman respectfully requests that this Honorable Court allow him to file the verified third amended complaint, which is annexed herewith marked as **Exhibit 1**.

WHEREFORE, Plaintiff Alan Golman respectfully requests from this Honorable Court to take notice of this motion and allow him to file the verified third amended complaint, with any other remedy that this Court deems to be just and proper.

RESPECTFULLY SUBMITTED.

In Miami, Florida, on the 21<sup>st</sup> day of March 2025.

CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that on this 21<sup>st</sup> day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

*s/Francisco M. López-Romo*

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